

Attorney Docket # 4925-98RCE

Serial No. 09/719,070  
Amendment dated April 13, 2005  
In response to Office Action dated December 13, 2004

### REMARKS/ARGUMENTS

The Office Action mailed December 13, 2004 has been reviewed and carefully considered. Claims 1-20 are pending, with Claims 1 and 13 being in independent form. Claims 1, 13, and 15 are being amended in the present Amendment in response to the December 13, 2004 Office action.

Support for the amendments may be found at least on page 2, lines 14-18; page 4, lines 7-13; page 5, lines 15-24; page 7, lines 3-5, 7-8, and 16-20; page 8, lines 28-29; page 9, lines 7-12; and FIG. 1 of the originally filed application.

In the December 13, 2004 Office Action, the Examiner rejected independent Claims 1 and 13, as well as Claims 2-12 and 14-20 dependent thereon, under 35 USC §103(a) as unpatentable over *Widegren et al.* (WO 97/34437; hereinafter *Widegren*) in view of *Veloso* (US 6,122,508; hereinafter *Veloso*) and *Malmstrom* (US 5,901,359; hereinafter *Malmstrom*). Reconsideration of these rejections is respectfully requested, at least on the basis of the foregoing amendments to the claims and the remarks below.

*Widegren* is directed to a "wireless office gateway (WO gateway)" which is integrated into both a private telephony network (PTN) and a public land mobile network (PLMN) (lines 10-30, page 3, *Widegren*). As seen in FIG. 1 of *Widegren*, this "WO Gateway 124" is part of a "wireless office system 142" inside PLMN 102 (line 36 of page 6 to line 1 of page 7, *Widegren*). The WO Gateway 124 is connected to (i) a public cellular telephone system 140 that is also part of PLMN 102, (ii) "radio access network (RAN) 126" within the wireless office system 142, and (iii) a "private fixed telephony network (PTN) 108" (line 11 of page 6 to line 21 of page 7, *Widegren*). In essence, WO Gateway 124 allows mobile terminals in RAN 126 inside wireless office system 142 to act as if they were "extensions" within PTN 108 (line 22 of page 7 to line 2 of page 9, *Widegren*). However, WO Gateway 124 does not let subscribers of the public cellular system 140 use subscriber apparatus in either RAN 126 or PTN 108 as if the subscriber apparatus was a mobile terminal 114 in public cellular system 140.

In other words, *Widegren* discloses a WO Gateway which allows the mobile terminals to emulate a node or terminal of the PTN. However, *Widegren* does not teach the emulation of

Attorney Docket # 4925-98RCE

Serial No. 09/719,070

Amendment dated April 13, 2005

In response to Office Action dated December 13, 2004

network functions both towards the mobile network **and** towards the subscriber system, based on the user's subscriber identity and/or stored subscriber data.

On the other hand, *Veloso*, like the present invention, is directed to providing users of a subscriber apparatus with the same services as the users of a mobile network. Please see the Background section of the present application (lines 6-20, page 1, present application), which refers to the European application corresponding to *Veloso*, for a complete description of *Veloso* and its various drawbacks. In short, *Veloso* discloses an arrangement where a SIM card containing subscriber data is inserted into the subscriber apparatus of the user in order to upload the user's subscriber data to the VLR of the local mobile switching center (MSC) (see, e.g., FIG. 1 and accompanying description, *Veloso*). In other words, a physical embodiment of the subscriber data is physically inserted into the subscriber apparatus and then transmitted via landline to a network element of a mobile telephone system.

*Malmstrom* is directed to a "single number service for providing integrated wireless and wireline communication networks for forwarding a call incoming to a subscriber's designated single telephone number" (Abstract, *Malmstrom*). In order to do so, a "wireline location register (WLR)" on the wireline network stores "subscriber mobile registration status", which is retrieved when a telephone call to the subscriber's designated single telephone number is received. *Id.* If the status indicates that the subscriber is "wireline registered", the call is routed to the subscriber's wireline destination number (see, e.g., col. 8, lines 49-65, *Malmstrom*). If the status indicates that the subscriber is "wireless registered", the WLR queries the HLR in the wireless network in order to get the subscriber's wireless destination number in order to route the call to that wireless number. *Id.* In other words, the WLR forwards the call to the appropriate location, whether in the wireline network or the wireless network.

None of these references, either alone or in combination, teach or suggest the emulation of network functions towards both a host mobile network and a subscriber system. By contrast, the invention claimed in amended independent Claims 1 and 13 acts as a desired interface between a subscriber system and a host mobile network by emulating network functions **both** towards the host mobile network and the subscriber system, based on the user's subscriber identity and/or stored subscriber data. More specifically, none of these references, either alone or in combination, teach or

Attorney Docket # 4925-98RCE

Serial No. 09/719,070

Amendment dated April 13, 2005

In response to Office Action dated December 13, 2004

suggest emulating towards a host mobile network a first desired interface by producing first signals representing signals of the host mobile network in a network element, the first desired interface being of the host mobile network, and emulating towards the subscriber system a second desired interface by producing second signals representing signals of the subscriber system in the network element, the second desired interface being of the subscriber system.

Because none of the cited references, either alone or in combination, teach or suggest these limitations, which are recited in amended independent Claims 1 and 13, Claims 1 and 13 are patentable over the cited references. Withdrawal of their rejection is respectfully requested.

At least through their dependence on amended independent Claims 1 and 13, which are believed to be patentable over the cited references, dependent Claims 2-12 and 14-20 are also believed to be patentable over the cited references. Withdrawal of their rejection is respectfully requested.

For the record, applicant repeats the argument made in the June 23, 2004 that (1) the Examiner has not made a *prima facie* case of obviousness at least because there is no teaching, suggestion, or incentive to combine *Widegren*, *Veloso*, and *Malmstrom*; and (2) the Examiner has yet to respond to the applicant's traversal of the original §103 rejection on the basis that there is no suggestion, motivation, or incentive to combine *Widegren* with *Veloso* (or *Widegren*, *Veloso*, and *Malmstrom*). Please the June 23, 2004, for explanation of these arguments.

On the basis of the foregoing, allowance of all presently pending claims is respectfully requested.

Respectfully submitted,

COHEN, PONTANI, LIEBERMAN & PAVANE

By



Teodor J. Holmberg

Reg. No. 50,140

551 Fifth Avenue, Suite 1210

New York, New York 10176

(212) 687-2770

Dated: April 13, 2005